



Priti International Limited

CIN : L36994RJ2017PLC058454

+291 2435699

g.d.lohiya@gmail.com

<https://pritihome.com>

Plot No. F-43, Basni, 1st Phase, Jodhpur,
Rajasthan - 342005 INDIA



PRITI INTERNATIONAL LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

PRITI INTERNATIONAL LIMITED

Registered Office: PLOT NO. F-43, BASNI 1ST PHASE
JODHPUR, RAJASTHAN -342001 INDIA

Corporate Office: 1, BASEMENT, ABHAY CHAMBERS
OPPOSITE SBI BANK, JALORI GATE JODHPUR
RAJASTHAN -342001 INDIA

CIN: L36994RJ2017PLC058454

E-MAIL: cs.pritiinternationaltd@gmail.com

WEBISTE: www.pritihome.com



PREFACE AND OBJECTIVE

The Board of Directors (“**Board**”) of **Priti International Limited** (“**Company**”), in its meeting dated **March 25, 2023**, has approved the policy for preservation of documents in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time (“**SEBI Listing Regulations**”), in supersession of all the previous policies of the Company in this regard.

As per Regulation 9 of the SEBI Listing Regulations, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e. (a) documents whose preservation shall be permanent in nature; and (b) documents with preservation period of not less than eight years after completion of the relevant transactions. The listed entity may keep such documents in electronic mode.

This Policy shall be effective from the date of its approval by the Board, that is, from March 25, 2023.

All the words and expressions used in this Policy, shall have the same meaning as respectively assigned to them in the Companies Act, 2013, SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and/or the rules and regulations made thereunder.

DOCUMENTS TO BE PRESERVED

This Policy sets the standards for preservation of documents of the Company, broadly classified in the following categories.

These documents may be preserved, in physical and/or electronic mode.

(i) CATEGORY A – DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

The following documents shall be maintained and preserved, permanently, by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- Incorporation Documents viz. the Memorandum of Association of the Company, Articles of Association of the Company, Certificate of Incorporation, Certificate of all amendments made in the Memorandum and Articles of the Company.
- Statutory Registers required under the Provisions of the Companies Act, 2013, Rules made thereunder, and other applicable laws
- Register of disposal of records
- Policies, Charters and Codes of the Company
- Minutes of the Board Meetings and Board Committees as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- Minutes of General Meetings as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.
- Property Card, Ownership, records issued by government Authority.

- Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
- Authorization / licenses obtained from any statutory authority
- The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company.
- Material agreements/ contracts, which, even if terminated, may have an impact on Business.
- Agreements made by the Company with stock exchanges, depositories, etc.
- Orders/judgement issued by Courts/statutory bodies and other background documents relevant for understanding such Orders
- Annual Reports of the Company
- Any other document, certificates, statutory registers that may be required to preserved permanently in terms the Companies Act, 2013 and/ or SEBI Listing Regulations.
- Prospectus / offer documents issued by the Company
- Disclosures made under Regulation 30 of the SEBI (LODR) Regulations, 2015

(ii) CATEGORY B – DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION.

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI Listing Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
- Disclosures received under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- Books of Accounts.
- Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013;
- Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- Disclosure of interest received from Directors of the Company in the manner prescribed.
- Instrument creating a charge or modifying a charge may be destroyed after a period of eight years from the end of financial year in which the said charge is satisfied.
- Employment record for the employees of the Company.
- Office Copies of Notices, Scrutinizer’s Report and related papers regarding General Meetings shall be preserved for as long as they remain current or for

eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the “Secretarial Standard-2 on General Meetings” issued by the Institute of Company Secretaries of India.

- Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the “Secretarial Standard-1 on Meetings of Board of Directors” issued by the Institute of Company Secretaries of India.
- Documents as are required to be maintained under relevant laws relating to direct and indirect taxes. In the cases where any enquiry, inspection, or investigation is pending under the Income Tax Act, 1961, the same shall be preserved for a period of eight years of the closure of the said enquiry, inspection, or investigation.
- Marketing documents.
- Press releases.
- Legal documents including but not limited to contracts or legal opinions, except those covered in category A.
- Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act, 2013 and/or SEBI Regulations, except those covered in category A.

(iii) CATEGORY C – GENERAL

In addition to the documents mentioned in Category ‘A’ and ‘B’ above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing Rules/ Procedures/ Practices of the Company or as per the applicable Statutory/ Regulatory provisions in this regard.

DOCUMENTS/ INFORMATION ON THE WEBSITE OF THE COMPANY

The Company shall at all times maintain a functional website containing following:

- The Basic Information about the Company and its business
- The Information and documents as may be required to be hosted on its website in terms of the Companies Act, 2013.
- The Information and documents as required to be hosted on its website in terms of Regulation 46 and other applicable provisions of the SEBI Listing Regulations and the information submitted with Stock Exchange(s) in terms of Regulation 30 of the SEBI Listing Regulations.

The Company shall ensure that contents of the website are correct.

The Company shall update any change in the content of its website within two working days from the date of such change in content.

The information/documents shall be arranged separately financial year wise with further separation into four quarters of the financial year.

All policies etc. or the information/ documents of a general nature shall be clubbed together at one place.

ROLES & RESPONSIBILITY

The Heads of respective departments of the Company shall be responsible for preservation of the documents in terms of this Policy, in respect of the areas of operations falling under the charge of each of them. The Heads of respective departments shall also ensure that the employees understand the Policy and perform the processes and procedures to execute this Policy.

DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ concerned Functional Director/ Head of the Department. This applies to both physical and electronic documents. The documents may be destroyed as follows:

- Recycle non-confidential paper records;
- Shred or otherwise render unreadable confidential paper records; or
- Delete or destroy electronically stored data.

The concerned Functional Director/Head of the Department shall maintain a Register for destruction of records, for recording the details of records of the Company so destroyed.

The person responsible and the person in whose presence the records are destroyed shall endorse the relevant entry in the said Register.

The person responsible for destruction shall ensure that documents & records are disposed-off in an effective manner that leaves no possibility for reconstruction of the records and information contained therein.

ARCHIVAL POLICY

The Company will host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations on the website of the Company for a period of five years and thereafter the same shall be archived for retrieval for such period as decided by the Managing Director or Chief Financial Officer or the Company Secretary of the Company or as may be required under the Act or SEBI Listing regulations.

Thereafter, the information/documents may be deleted permanently after obtaining approval from the Managing Director or Chief Financial Officer or the Company Secretary of the Company.

Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary of the Company.

GENERAL

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

AMENDMENT TO THE POLICY

The Board of Directors may, subject to the applicable laws amend any provision(s) or substitute any of the provision(s) of this Policy with new provision(s) or replace this Policy in entirety.

Any subsequent amendment / modification in the Act and the SEBI Regulations and / or any other laws in this regard shall automatically apply to this Policy.

REVIEW

This Policy shall be subject to review/changes as may be deemed necessary and in accordance with regulatory amendments from time to time.

COMMUNICATION

This Policy shall be uploaded on the website of the Company.

Any questions and clarifications relating to this Policy should be addressed to the Company Secretary at cs.pritiinternationaltd@gmail.com

COMPLIANCE

The Managing Director or Chief Financial Officer or the Company Secretary of the Company shall, severally be responsible for supervision of the Policy.

INTERPRETATION

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy.